

REMARKS

Claims 66-100 and 102-133 are pending in this application. Claims 66, 81, 83, 84, 86, 95, 108, 128, 130 and 133 are amended by this Amendment.

The Office Action dated March 23, 2006 objects to claims 66, 81, 83, 84, 86, 95, 108, 128, 130 and 133 because of informalities. The Office Action also rejects claim 66 as being indefinite under 35 U.S.C. 112, second paragraph, and rejects claims 66-100 and 102-133 under 35 U.S.C. 102(a) as being anticipated by prior art.

Claim Objections

The objections to the claims are set forth in parts 1-10 on pages 2-3 of the Office Action. Specifically, claims 66, 81, 83, 84, 86, 95, 108, 128, 130 and 133 are objected to because of informalities. Applicants have corrected the noted informalities in this Amendment.

Indefiniteness Rejection

The indefiniteness rejection of claim 66 is set forth in part 12 on page 3 of the Office Action. Specifically, the rejection states that there is insufficient antecedent basis for the limitations “said second entity” and “said first entity” in lines 7 and 8 of claim 66. Applicants have deleted these limitations from claim 66.

Anticipated rejections of the claims

The grounds for the anticipation rejection of claims 66-100, and 102-133 are set forth in part 15 on pages 3 to 13 of the Office Action. Specifically, the claims are rejected as being anticipated by the preferred embodiments discussed in Published PCT Application No. WO99/04582 by Ludwig (these preferred embodiments hereinafter being referred to simply as “Ludwig”). Applicants respectfully traverse the anticipated rejections of the claims on the grounds that it fails to establish a *prima facie* case that Ludwig suggests each and every one of the combination of features recited in the independent claims.

For example, independent claim 133 is directed to a method for obtaining location information on the location of a first station in a network. The method includes receiving a request from an external element as to the location of a mobile station at a dedicated address, wherein any request received at said address is a location request.

In contrast, Ludwig includes a method for positioning a mobile device, such as a portable computer, connected to a mobile station, such as a mobile phone, which is connected to a network. The mobile station receives "location specific data" broadcast from a number of surrounding base stations. This information is used to locate the mobile station thus the mobile device. Then, "the mobile device is adapted to request a location dependent WWW service from the WWW server on the basis of location specific data" (see page 8, paragraph 1).

In one preferred embodiment, the mobile station performs calculations on this data to produce a position, in another embodiment the data, unmodified, is passed on to an external server. It is therefore apparent that Ludwig does not anticipate the claimed invention. There is no disclosure of an external element requesting a location from the network or mobile device. In Ludwig, the mobile device requests a location dependent service, and provides location information with that request.

Secondly, there is no mention of the server contacting the mobile device at an address, "wherein any request received at said dedicated address is a position request". In Ludwig, "an HTTP request is then transferred to a WWW server in the packet data network". Assuming merely for the sake of argument that a request is made on the HTTP port (a dedicated address for HTTP requests), this port is not dedicated to position requests, but rather is used for all communications involving HTTP.

Furthermore, there is no suggestion in Ludwig that would lead someone skilled in the art to make the present invention. Ludwig specifically avoids a network positioning the mobile station and thus the mobile device. The mobile station receives information which enables a limited accuracy position to be provided by the mobile device when requesting location dependent services. Accordingly there would be no need, in Ludwig, for an external element to make a positioning request.

Furthermore, there is no recognition in the cited reference of the problem identified by this application, of the difficulties in responding to location requests specifying an IP number, with the location service positioning a mobile station based on the MSISDN number or similar. This application teaches a method and system for facilitating location requests in the communication network. Under, for example, the GSM standard, a mobile station will have an

MSISDN number unique to the mobile station which identifies it in the network. The network is configured so that when a location request is made, the mobile station is identified by this number and positioned accordingly.

A mobile device, such as a laptop computer, may connect to the communication network via the mobile station, to get for example, internet access. When the mobile station makes a data connection, for example to access a web page, the GPRS standard or similar is used. Under this standard the mobile station is assigned a PDP address when connecting. This address is a dynamic internet protocol (IP) address.

The mobile station may access an external server hosting a website offering location dependent services. The connection to this server will be via IP, and the server will only know the IP address of the mobile station. Accordingly should the server make a location request relating to the IP access, it will only be able to provide the IP address and not the MSISDN number.

The problem identified by this application is that it is difficult for the server to obtain location information relating to the IP address since: 1) the address is dynamic, that is it is not unique to a given mobile station, and 2) that current location standard related to the MSISDN rather than the IP address. The present application therefore provides a system in which location requests are made to a dedicated address, the system arranged such that any request received at this dedicated address is a position request. The mobile station can easily recognize a position request and initiate a position determining procedure when such a request is made, or the GGSN can intercept a position request sent to the IP address of the mobile station and initiate a positioning procedure in the network.

Accordingly, applicants respectfully submit that the claimed invention is neither anticipated or suggested by the preferred documents in the cited reference.

The Commissioner is authorized to charge the fee for a two-month extension of time, and any additional fees which may be necessary for the consideration of this Amendment, to Deposit Account No. 10-0100 (Dkt. No. NOKIA.4009US), and credit any overpayment or excess fees to such deposit account.

Respectfully submitted,



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